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18 Attorneys for Defendants

19 TANEY ENGINEERING, INC. and

20 TANEY CUNNINGHAM

21 EQUIPMENT, LLC

22 UNITED STATES DISTRICT COURT
23 NORTHERN DISTRICT OF CALIFORNIA

24 AUTODESK, INC.,

25 Plaintiff,

26 v.

27 TANEY ENGINEERING, INC. et al.

28 Defendants

CASE NO. 5:08-cv-03132

DECLARATION OF
EDWARD TANEY
IN SUPPORT OF MOTION
TO DISMISS FOR LACK OF
PERSONAL JURISDICTION
AND IMPROPER VENUE

///

1 EDWARD TANEY, hereby declares the following as true under penalties of perjury
2 of the laws of the United States:
3

4 1. I am president of Taney Engineering, Inc. ("Taney Engineering") I am also a member
5 of Taney Cunningham Equipment, LLC ("TCE"). Unless otherwise indicated, the
6 statements contained here are based upon my own personal knowledge.
7

8 2. Taney Engineering and TCE have been named as Defendants in the lawsuit styled
9 *Autodesk, Inc. v. Taney Engineering, et al.*, No. 5:08-cv-03132, in the United States
10 District Court for the Northern District of California.
11

12 3. Taney Engineering is a full service civil engineering and land survey services
13 company. It employs over twenty engineers, surveyors, and other staff. Taney
14 Engineering performs its services exclusively in the States of Nevada and Arizona.
15

16 4. TCE is a limited liability company that provides services to businesses exclusively in
17 the States of Nevada and Arizona.
18

19 5. Taney Engineering is a Nevada corporation with its principal place of business in Las
20 Vegas, Nevada.
21

22 6. TCE is a Nevada limited liability company with its principal place of business in Las
23 Vegas, Nevada.
24

25 7. Taney Engineering and TCE are and always have been Nevada and Arizona business
26 entities with their principal places of business in Nevada.
27

28 8. Neither Taney Engineering nor TCE has ever had an office, address, or telephone
number in California.

- 1 9. Neither Taney Engineering nor TCE has ever owned or rented any property in
2 California.
- 3
- 4 10. Neither Taney Engineering nor TCE has ever paid taxes in California.
- 5
- 6 11. Neither Taney Engineering nor TCE has ever held a bank account in California.
- 7
- 8 12. Neither Taney Engineering nor TCE nor their agents ever traveled to California in
9 connection with any transaction involving Autodesk, Inc..
- 10
- 11 13. The allegations in the Complaint do not pertain to property or equipment located in
12 California.
- 13
- 14 14. Prior to the commencement of these proceedings, I was not aware that Autodesk, Inc.
15 was headquartered in San Rafeal, California or that Autodesk, Inc.'s primary place
16 of business was within the Northern District of California.
- 17
- 18 15. It is my understanding that neither Taney Engineering nor TCE were aware that
19 Autodesk, Inc. was headquartered in San Rafeal, California or that Autodesk, Inc.'s
20 primary place of business was within the Northern District of California.
- 21
- 22 16. TCE did not purchase any software directly from Autodesk, Inc.
- 23
- 24 17. Taney Engineering did not purchase any software directly from Autodesk, Inc. Taney
25 Engineering did purchase Autodesk products from The CAD Store located in Peoria,
26 Arizona.
- 27
- 28

1 I declare under penalty of perjury that the foregoing is true and accurate to the best of my
2 knowledge, information and belief.
3

4 Executed at Las Vegas, Nevada
5 August 6, 2008

6 
7 _____
EDWARD TANEY